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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LEZLIE J. GUNN, an individual,
Plaintiff,
vs.
CHRISTINE E. DRAGE, an individual,
Defendant.

) Case No: 2:19-cv-02102-JCM-EJY
) Assigned for all purposes to
Hon. James C. Mahan
) **STIPULATION FOR STAY OF
ENFORCEMENT OF JUDGMENT
UPON POSTING OF APPELLATE
BOND**
) Action Filed: September 6, 2019
) Judgment Entered: May 1, 2020

STIPULATION

Plaintiff Lezlie J. Gunn and defendant Christine E. Drage, by and through their undersigned counsel, enter into the following stipulation with reference to the following:

WHEREAS, judgement was entered in this action in favor of defendant Drage and against plaintiff Gunn on May 1, 2020;

WHEREAS, an amended judgment was entered on March 17, 2021, awarding defendant Drage attorney's fees and costs against plaintiff Gunn;

WHEREAS, the Parties have engaged in discussions regarding plaintiff Gunn's posting a bond to secure the award in the March 17, 2021 amended judgment;

WHEREAS, plaintiff Gunn is making arrangements to post the bond by February 4, 2023;

WHEREAS, the Parties agree that upon posting of the bond in the amount of \$401,949.15, proceedings to enforce the judgment will not be necessary pending plaintiff Gunn's appeal to Ninth Circuit Court of Appeals;

WHEREFORE, IT IS HEREBY STIPULATED by and between the Parties, through their respective attorneys of record, that there will be a stay of execution on defendant Drage's judgment against plaintiff Gunn immediately upon the posting of the bond contemplated above, and that the stay will extend until 30-days after the Ninth Circuit Court of Appeals issues its final decision concerning the March 17, 2021 amended judgment.

DATED: January 27, 2023

THOMAS VOGELE & ASSOCIATES, APC

By: /s/ Timothy Kowal
Thomas A. Vogele
Timothy M. Kowal
Teddy T. Davis
Attorneys for plaintiff Lezlie J. Gunn

DATED: January 27, 2023

**BROWNSTEIN HYATT FARBER
SCHRECK, LLP**

By: Mitchell J. Langberg
Attorneys for defendant Christine E. Drage

DATED: February 1, 2023

UNITED STATES DISTRICT JUDGE

PROOF OF SERVICE

I, declare that I am over the age of 18 years, employed in the County of Orange, and not a party to the within action; my address is 129 W. Wilson St., Suite 200, Costa Mesa, CA 92627. On January 27, 2023 I served the foregoing:

**STIPULATION FOR STAY OF PROCEEDINGS TO ENFORCE JUDGMENT
UPON POSTING OF SURETY**

on the interested parties in this action via email to the persons hereinafter listed:

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Attorneys for defendant Christine E. Drage

Attorneys for defendant Christine E. Drage

(STATE) I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on January 27, 2023, in Costa Mesa, California.

/s/ Lynne Marino

Lynne Marino